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*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates to:  
  
ALL ACTIONS

CASE NO. 3:23-md-03084-CRB (LJC)

**DECLARATION OF  
CHRISTOPHER V. COTTON IN  
SUPPORT OF DEFENDANTS'  
MOTION TO COMPEL  
COMPLIANCE WITH CIVIL  
LOCAL RULE 3-15 AND COURT  
ORDERS**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, declare as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants  
3 Uber Technologies, Inc., Raiser, LLC, and Raiser-CA, LLC (collectively, "Uber" or "Defendants").  
4 I make this declaration in support of Defendants' Motion to Compel Compliance With Civil Local  
5 Rule 3-15 and Court Orders. I make this declaration of my own personal knowledge. If called as a  
6 witness, I could and would testify to the matters set forth herein.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of "Fortress' Billions Quietly  
8 Power America's Biggest Legal Fights," Bloomberg Law, dated October 16, 2024.

9 3. Attached hereto as **Exhibit B** is a true and correct copy of Dkt. No. 3684 which is  
10 Plaintiffs' Status Report in response to Court Order, Dkt. No. 3676.

11 4. Attached hereto as **Exhibit C** is a true and correct copy of Dkt. No. 3683 which is  
12 Plaintiffs' Status Report in response to Court Order, Dkt. No. 3625.

13 5. Attached hereto as **Exhibit D** is a true and correct copy of Dkt. No. 3685 which is  
14 Plaintiff's Status Report in response to Court Order, Dkt. No. 3676.

15 6. Attached hereto as **Exhibit E** is a true and correct copy of Dkt. No. 3698 which is  
16 Plaintiffs' Status Report in response to Court Order, Dkt. No. 3676.

17 7. Attached hereto as **Exhibit F** is a true and correct copy of a letter from Mark Premo-  
18 Hopkins to Plaintiffs' Counsel concerning deficiencies regarding the Civil Local Rule 3-15 Status  
19 Reports filed by Plaintiffs' firms, dated August 18, 2025.

20 8. Attached hereto as **Exhibit G** is a true and correct copy of an email chain between  
21 counsel regarding a meet and confer regarding Civil Local Rule 3-15 Status Report deficiencies,  
22 dated August 19, 25-26<sup>th</sup> 2025.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing  
24 is true and correct. Executed this 24th day of September, 2025, at Kansas City, Missouri.

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CHRISTOPHER V. COTTON